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IN THE UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

MARIE ENCAR ARNOLD,

Plaintiff,

v.

UNITED STATES DISTRICT COURT, ET
AL.,

Defendants.

No. 1:23-cv-00266-ADA-CDB

**REPLY IN SUPPORT OF UNITED STATES OF
AMERICA’S MOTION TO DISMISS**

I. INTRODUCTION

The United States hereby submits this reply in support of the motion to dismiss.

II. ARGUMENT

Plaintiff Marie Encar Arnold’s claims are implausible and incoherent. In her opposition, Arnold argues that the Court has jurisdiction because she suffered “injuries of mental schizophrenia¹ ‘hearing voice’ effected and cause by U.S. government wire and oral electronic communication and physical pain and suffering digital Artificial Intelligence abuse of power ‘cruel and inhumane torture punishment[.]’” ECF No. 16 at 2. These allegations are “so bizarre and delusional that they are wholly insubstantial and cannot invoke this Court’s jurisdiction.” *O’Brien v. United States Department of Justice*, 927 F. Supp. 382, 385 (D. Ariz. 1995), *aff’d*, 76 F.3d 387 (9th Cir. 1996). As with the claims recently filed in the Northern District of California, Arnold’s claims here are “‘inherently implausible” and thus “subject to dismissal for lack of subject-matter jurisdiction.” *Arnold*, 2020 WL 732996, at *3.

¹ It appears that Arnold has been formally diagnosed with schizophrenia by a physician in the recent past. *See* ECF No. 1-1 at 95.

For the aforementioned reasons, the United States respectfully requests that the Court dismiss Plaintiff's complaint.

Respectfully submitted,

By: /s/ W. Dean Carter
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